

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No.: 20-10041-PBS
)	
v.)	
)	
BRUCE BROWN a/k/a Arki)	
)	
Defendant.)	

GOVERNMENT'S MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure and Rule 116.6(B) of the Local Rules of the United States District Court for the District of Massachusetts, the United States of America hereby makes this motion for this Court to enter a protective order with regard to the discovery materials marked “Confidential” that are produced by the government to any defendant or defense attorney (collectively “the defense”), with regard to the above captioned indictment and any superseding indictment that may be filed in this case. In support of this motion, the government states:

1. The government has produced and intends to produce and/or make materials available to the defense in this case pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure and Local Rules 116.1(C) and 116.2 on an ongoing basis. The government intends to produce materials under the Jencks Act (18 U.S.C. §3500) in advance of trial.

2. The materials that will be produced include, inter alia, law enforcement reports, sensitive information and images regarding sexual activity, materials seized pursuant to search warrants, search warrants, supporting affidavits, and related documentation and personal messages. The materials include information that is relevant to ongoing components of this investigation.

3. During the course of the investigation, numerous victims and/or witnesses expressed fear of retaliation. Premature public disclosure of confidential materials and information could severely jeopardize ongoing components of this investigation, and create serious risks to the safety of victims, any cooperating witnesses, confidential informants, and law enforcement personnel.

4. Accordingly, the government requests that this Court enter a protective order (a) directing that all materials marked “Confidential” that the defense receives or has received from the government with regard to this case shall be used solely for good faith preparation for trial and defense of this case and shall not be used by the defense for any other purpose; (b) requiring the defense to hold securely all of the Confidential materials and copies, in locations not accessible to the defendant or third parties (c) requiring the defense not to permit the defendant or any third party to take, copy, or record in any way any of the Confidential materials, copies, or contents thereof except as specified in the attached proposed order; and (d) requiring that upon the conclusion of the participation in this case by any member or members of the defense, all Confidential materials received from the government in this case, and all copies thereof shall promptly be returned to the government or destroyed.

5. Defense counsel has assented to this motion, without prejudice to seeking relief from the order should the need arise in the future. A proposed order is attached to this motion.

Dated: March 23, 2020

Respectfully Submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Mackenzie A. Queenin
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Mackenzie Queenin

Mackenzie Queenin

Assistant United States Attorney

Date: March 23, 2020